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To Whom It May Concern:

I am writing today out of concern for my business and the carbon reduction goals of the State of California. We request that Title 24 implementation be delayed until at least July, or however long it takes to give stakeholders the implementation details needed to survive and adapt. As one example, 3rd party rebate programs should know the impact to base case calculations and rebate levels so that contractors may be given 2-3 months advanced notice.

New Light Energy Design is an energy efficient lighting contractor started in 2009, based in San Francisco. My business partner and co-owner and I met at the Presidio Graduate School where we both earned our MBA in sustainable management and we're both working in sales as lighting efficiency auditors. We saw the great value proposition of the 3rd party rebate program, partnered with a C-10 contractor and started selling and installing jobs.

Jump ahead almost 5 years and we have installed over 800 jobs, producing over 17,000 MW hrs. of annual energy savings. We are an active contractor in all the greater Bay Area 3rd party programs, including by far the leading contractor in San Francisco Energy Watch program. We have serviced great clients such as Comcast, Enterprise, Academy of Art (32 facilities), and have serviced many corner stores, small non-profits, and the like who would never have had the cash of know-how to implement proper illuminating and light saving measures without the rebate programs and a contractor such as ourselves.

In our peak last year we were employing 25 people, including 15 installers. This year we were hit hard by T12 rebate changes. It's a bit of a tragedy as I still see the bounty of businesses, most of them small businesses, that still have T12s, and how all the Lowes and Home Depot's are still piled high with T12 replacement lamps. At the end of last year we had a great crew and wanted to keep as many as we could as we were expecting the rebate programs to re-launch quickly. Without any proactive stakeholder engagement we were left in the dark as the programs struggled to re-launch, some of them not launching until mid-way through the year. This year we have absorbed a loss of \$200,000 thus far, which puts us on the brink of having to shut down. We can not sustain another period of trying to operate 'in the dark'.

Now, we have just gotten our feet back underneath us as we build our footing in the LED retrofit market. We had our biggest month of sales in over a year and are ramping up our install crew, once again struggling to get jobs completed before the Title 24 deadline and the install deadlines that most of the rebate programs have put on us. Once again we have 0 visibility into next year as to exactly how we will be affected by title 24 and how the rebate programs will be affected. I had to laugh in dismay upon receiving a recent PG&E trade pro announcement that they are planning workshops next year that will cover 'how title 24 will affect your business'. Sadly, our business will already be affected and most likely it will be too late.

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While I still maintain the gutting of T12 rebates was and is a huge mistake, I feel that strong code standards are a great tool to reduce demand and guide the market. However, I don't feel that it is appropriate to widen their scope to affect most of the retrofit market and rebate programs (at least for small to medium sized businesses). Over ninety percent of our jobs are rebate driven and we are talking about adding huge costs with mandatory controls, bi-level fixtures, and day light harvesting. Cost increases coupled that with reduction in rebates will kill our business and the industry - businesses will just opt to not do the job. Conversely, when there is no choice but to do the work - with tenant improvements and new construction – it's a great arena for strengthening code. While the spirit of the new code is in the right place, its implementation, at least in the retrofit market, will work against its goals and the mandates of AB32.

When policy changes will drastically impact an industry, its implementation must be coupled with the engagement and education that produce clarity for all parties affected. We are far from this point. I urge you to delay the implementation of title 24, reconsider its impact on the retrofit market and small business, and in the time allotted by this delay, ensure that the work is done to figure out and communicate the details and impacts of its implementation.

Thank you for your consideration of our position and our value and importance in achieving our collective carbon reduction goals. I am happy to discuss our position in further detail.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bret Walburg', with a horizontal line underneath.

Bret Walburg
CEO
New Light Energy Design

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